

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**CO-LEAD CLASS COUNSEL'S MOTION TO COMPEL
RD LEGAL FUNDING, LLC, RD LEGAL FINANCE, LLC,
RD LEGAL FUNDING PARTNERS, LP, AND RONI DERSOVITZ
TO RESPOND TO THE DISCOVERY REQUESTS PROPOUNDED
IN ACCORDANCE WITH THE COURT'S ORDER OF JULY 19, 2017**

Co-Lead Class Counsel submit this Motion seeking an Order compelling RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz (collectively, "RD Legal"), to respond fully and completely to the Requests for Production of Documents and Interrogatories propounded upon RD Legal by Co-Lead Class Counsel, on July 25, 2017, consistent with the Order issued by this Court on July 19, 2017. Pursuant to the MDL

statute, 28 U.S.C. § 1407, Fed. R. Civ. P. 23(d) and the All Writs Act, 28 U.S.C. § 1651, and for the reasons stated in the accompanying Memorandum of Law, the Motion should be granted and RD Legal should be ordered to provide full and complete responses to the discovery requests within five (5) days.

Dated: August 21, 2017

Respectfully submitted,

/s/ Christopher A. Seeger
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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter. The below counsel for RD Legal were served via email and Federal Express Overnight Mail.

David K. Willingham, Esquire
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Dated: August 21, 2017

/s/ Christopher A. Seeger
Christopher A. Seeger